

Eastern District of Wisconsin

Plaintiff: Terrance Prude,

- vs -

Case No. 23-CV-1233

Defendant: Candice Dixon.

Declaration & Proposed Findings Of
Facts Combined By Terrance Prude

I, Terrance Prude, declare under penalty of perjury that the Proposed Findings Of Facts ("PFOF") in the below paragraphs are true and correct and based on my personal knowledge & experience & made voluntarily:

(1) Between the month's December of 2022 & January of 2023 Candice Dixon came to me and told me she was aware of a "credible and corroborated threat to stab you".

(2) I asked Dixon the name of the person who was supposed to be stabbing me, she told me the inmate name was Titus Henderson.

(3) A few days later, Dixon returned to my cell telling me that if I "wanted to avoid that attempt on your life" that I should have my "family cash app \$2,000 to CandiBands [or CandiLand]" and handed me a piece of paper that had "CandiBands [or CandiLand]" written under

the words "My cash app".

(4) I ripped up the paper and said "You got me fucked up, I'm not paying you or Titus nothing". Dixon walked off stating "your funeral".

(5) In January of 2023, I learned from inmates and prison staff that Dixon was "fired for bringing in drugs and cell phones for inmates".

(6) While being stabbed on March 11, 2023, Titus Henderson was stating "this for not paying Dixon".

(7) Hearing this, while being stabbed, made me understand that Titus Henderson was the one involved with Dixon in the attempt to extort me & that my refusal to pay Dixon \$2,000 was why I was being stabbed.

(8) Prior to being stabbed, Dixon led me to believe that she would report the threat to the Security Director John Kind, by saying she would.

(9) Security Director John Kind reported to the Institution Complaint Examiner ("ICE"), A. DeGroot, that "Dixon never said anything to him". See Dkt. #1-1, Page 10.

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(10) The ICE, A. DeGroot, also investigated Dixon's actions and found that Dixon "did not submit an incident report" about the threat to stab me. See Dkt. #1-1, Page 10.

(11) I refused to report the incident myself prior to being stabbed because I just don't trust prison officials to keep me safe. The fact a prison staff (i.e. Dixon) was directly involved in: (1) the attempt to extort me for \$2,000; and (2) facilitating the attempt to have me stabbed when I refused to pay the \$2,000 extortion fees, is what made me not know who to trust because for all I knew other prison staff could have been working with Dixon & Titus Henderson.

(12) I suffered a severe stab wound to my neck as a direct result of Dixon's actions & omissions. See Dkt. 1-1, Page 22-23.

(13) I suffered, & continue to suffer, physical pain as a result of being stabbed. See Exhibit #1, Page 1-19. attached. I was also prescribed a device called Transcutaneous Electrical Nerve Stimulation (T.E.N.S.) which treats my nerve damage in my neck rooted from being stabbed in my neck. See Exhibit #3, Page 4, attached.

(14) I'm also prescribed pain medication such as Naproxen

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and Acetaminophen to treat the daily pain I still have. See Exhibit #2, Page 2-10, attached.

(15) I also suffered, and continue to suffer, emotional & mental pain & suffering where I had nightmares of the stabbing incident I experienced where I died in my dreams. See Exhibit #1, Page 1 & 9; and Exhibit #2, Page 12-13, attached.

(16) I was seen by a psychiatric doctor for my mental sufferings and I was prescribed a psychotropic medication called Mirtazapine. See Exhibit #2, Page 10-13, attached.

(17) I declare that Exhibits #1, #2 and #3 are true & correct documents from my ~~medical records~~ medical records that I obtained from my medical file.

(18) Candice Dixon was inappropriately having a sexual relationship with inmates where she was taking sexual photos of herself¹ and gave them to Titus Henderson and another inmate name "Jamil"

¹ Some of the photos shown her face and some merely shown her body parts.

~~_____~~ who would sell the photos to inmates.

(19) Defendant Dixon thought I was provided some of these porn photos of her (despite me telling her, Jamil, ~~_____~~ and Mr. Henderson I didn't have them). Dixon herself indicated (in conjunction with ~~_____~~ "Jamil" and Henderson) that if I didn't turn over the porn photos of her (or pay \$2,000 to avoid the assault/threat that I'd be assaulted) I'd be assaulted.

(20) Dixon was placed under investigation by prison officials for this inappropriate relation with "Jaleel" and was confronted with the evidence against her and placed on investigative leave.

(21) Dixon chose to quit her job as a prison guard in the face of the evidence which proved she was providing porn photographs of herself to inmates. Being fired was imminent and to avoid being fired Dixon chose to quit her job as a prison official.

(22) Quitting is what prevented prison investigators from questioning Dixon about her involvement in me being assaulted. See Dkt #1-1, Page 10 ("Officer Dixon no longer works for the DOC so I am not able to contact her.").

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(23) Defendant Dixon, during discovery, has denied that her no longer working as a prison guard derived from her having an inappropriate relationship with inmates.^a See Dkt. #18, Exhibit #4, Page 2 of 3 at par 1. of Defendant's Response To Plaintiff's First Request For Admissions.

(24) Had Dixon not had an inappropriate relationship with these inmates [REDACTED] where she provided porn photographic images of herself it would not have caused "Jamil" and Henderson to use the photos as a starting point (with Dixon's help) to extort me. Not only was Dixon aware of the threat to assault me, she helped to facilitate it when I refused to submit to paying \$2,000 when she falsely accused me of possessing the photos of her.

Terrance Prude
Terrance Prude
6-16-2024

^a After research/investigating the facial identity of "Jaleel" I've now learned that this "Jaleel" is not "Jaleel Schultz". In fact, I've learned that the inmate who I was told name was "Jaleel" is actually name "Jamil" real name Jamie (I'm told).